

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS, *et al.*

*Plaintiffs,*

V.

GREG ABBOTT, *et al.*,

*Defendants.*

Case No. 3:21-cv-00259  
[Lead Case]

TEXAS STATE CONFERENCE OF  
THE NAACP,

*Plaintiff,*

V.

GREG ABBOTT, *et al.*,

*Defendants.*

Case No. 1:21-cv-01006  
[Consolidated Case]

## PLAINTIFF MALC'S NOTICE OF SUBMISSION OF EXPERT REPORTS

Pursuant to the Court’s Supplemental Pretrial Scheduling Order dated May 1, 2025 (Dkt. 921), Plaintiff MALC hereby submits the expert reports that it intends to affirmatively rely on and submit as evidence at the upcoming trial in the above-captioned matter, scheduled to commence on May 21, 2025. The expert reports attached to this submission are as follows:

- Attachment A: Declaration of Dr. J. Morgan Kousser, dated June 1, 2022
- Attachment B: Rebuttal Expert Report of J. Morgan Kousser, dated August 8, 2022
- Expert Reports of Dr. Matthew Barreto and Dr. Tye Rush, as previously disclosed and served by the Brooks Plaintiffs. MALC Plaintiffs are relying on the Brooks Plaintiffs' filing the reports of these joint experts to avoid duplicative report filings.

Consistent with the Court's Order, color copies of the above-referenced expert reports were delivered to the chambers of each judge on May 2, 2025. MALC also reserves the right to rely on or submit as evidence in favor of its claims any opinions proffered by any other expert during the course of this trial, including those from any co-plaintiff experts filed with the Court.

Respectfully submitted,

SOMMERMAN, MCCAFFITY,  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing and all attachments was filed and served via the Court's electronic filing system on May 2, 2025.

s/ Sean J. McCaffity  
Sean J. McCaffity